

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA**

<b>UNITED STATES OF AMERICA</b>	*	<b>CRIMINAL DOCKET NO. 10-30</b>
<b>v.</b>	*	<b>SECTION: "A"</b>
<b>STEPHANIE O. LANGLIOS</b>	*	
<b>a/k/a Stephanie O'Neil</b>		
	*      *      *	

**FACTUAL BASIS**

If this case were to proceed to trial, the United States would prove beyond a reasonable doubt, through credible testimony and reliable evidence, the following facts:

**The Office of Management and Budget**

The Office of Management and Budget ("OMB") is an agency of the United States of America, having a seal that was created by President Nixon on June 29, 1971 pursuant to Executive Order Number 11600. The OMB's mission is to assist the President of the United States in the development and execution of his policies and programs. OMB has a hand in the development and resolution of all budget, policy, legislative, regulatory, procurement, and management issues on behalf of the President. On or around September 30, 2005, OMB issued a statement that it does not award grants. The statement explained "OMB leads development of government wide policy to assure that grants are managed properly and that Federal dollars are spent in accordance with applicable laws and regulations."

**Stephanie O'Neil Langlois Forged The Seal of the OMB**

On August 29, 2005, Hurricane Katrina made landfall in Louisiana causing widespread damage to the City of New Orleans. From on or around March of 2007 through March of 2008 the defendant, **STEPHANIE O. LANGLOIS (“LANGLOIS”)** devised a scheme to defraud small businesses into thinking that they had been awarded a grant from the OMB in order to start or rebuild their businesses. It was part of her scheme that she knowingly used, affixed, and impressed fraudulently made and counterfeit seals of the OMB onto letters that were purportedly from the OMB. At the time **LANGLOIS** gave these individuals the letters, she knew that the letters were forgeries and that no OMB grant existed.

All of the letters **LANGLOIS** forged followed a similar, if not identical format. Each letter contained a letter-head featuring the official seal of the OMB and an official grant serial number from the United States Department of Agriculture (“USDA”) database. **LANGLOIS** used the OMB seal and the USDA serial number to make the grant-award letters look as if they were authentic. **LANGLOIS** never applied for any grants under this serial number on her behalf or on behalf of any other individuals or businesses.

In addition to using the OMB seal and the grant serial number, each letter stated that the grant recipient had been awarded a grant anywhere from \$ 22,000 to \$ 345,000, and explained that “[a]ll qualification criteria and additional addendums of this grant have been met and exceeded, as such this office has made a final decision of award.” The grant letters also stated that the recipient would receive a direct deposit or a check via United States Postal Service.

None of the individuals who received these false grant letters ever received any money from the grant, as promised by **LANGLOIS**, despite paying **LANGLOIS** retainer fees and other

fees related to her promise that she would apply for bona-fide post-Hurricane Katrina grant assistance.

The below individuals received grant letters using the counterfeit seal of the OMB on or around the following dates and suffered the below loss amounts:

#	Date	Individual	Grant Amount	Loss Amount
1	10/11/07	A	\$ 345,000	\$ 7,300
2	10/12/07	B	\$ 345,000	\$ 3,000
3	10/18/07	C	\$ 22,000	\$ 300
4	10/19/07	D	\$ 320,000	\$ 900
5	10/22/07	E	\$ 128,000	\$ 1,500
6	10/24/07	F	\$ 268,000	\$ 0
7	11/6/07	G	\$ 42,000	\$ 2,000
8	12/17/07	E	\$ 128,000	\$ 0
Total	\$ 15,000			

In summary, all of the evidence introduced at trial would establish the elements of the offense and prove the defendant's guilt beyond a reasonable doubt.

**READ AND APPROVED:**

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STEPHANIE LANGLOIS (Date)  
Defendant

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THOMAS CALOGERO (Date)  
Counsel for Defendant

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SHARAN E. LIEBERMAN (Date)  
Assistant U.S. Attorney